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*Attorneys for Defendants Nevada Charter Academies dba  
 American Preparatory Academy – Las Vegas, Lee Iglody,  
 Jonathan Gardner, Melissa St. Jean, Ernie Elliott, Candyce Farthing*

**UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**

\* \* \*

AMERICAN PREPARATORY SCHOOLS, INC., a Utah Corporation,	)	Case No: 2:20-cv-01205-JAD-NJK
	)	
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER</b>
vs.	)	<b>EXTENDING TIME TO FILE</b>
	)	<b>RESPONSE TO PLAINTIFF'S</b>
NEVADA CHARTER ACADEMIES d/b/a	)	<b>COMPLAINT</b>
AMERICAN PREPARATORY ACADEMY –	)	
LAS VEGAS, a Nevada Corporation, LEE	)	<b>(First Request)</b>
IGLODY, an individual, JONATHAN	)	
GARDNER, an individual, MELISSA ST.	)	
JEAN, an individual, ERNIE ELLIOT, an	)	
individual, and CANDYCE FARTHING, an	)	
individual, RACHELLE HULET, an individual,	)	
	)	
Defendants.	)	
_____	)	

Defendants Nevada Charter Academies dba American Preparatory Academy – Las Vegas,  
 Lee Iglody, Jonathan Gardner, Melissa St. Jean, Ernie Elliott, and Candyce Farthing, Defendant  
 Rachelle Hulet (altogether herein referred to as “Defendants”), and American Preparatory Schools,  
 Inc. (“Plaintiff”), by and through their respective attorneys of record, HEREBY STIPULATE AND  
 AGREE, that Defendants shall have through and including **July 27, 2020**, within which to file and  
 serve a response to Plaintiff’s Complaint [ECF No. 1]. This Stipulation is made in accordance with

**LIPSON NEILSON P.C.**

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1 LR IA 6-1 and LR 6-2, of the Local Rules of this Court. This is the first request for extension of  
2 time to file an answer or otherwise respond to Plaintiff's Complaint from the original due date of  
3 July 16, 2020

4 Pursuant to Local Rule IA 6-1(a), the parties state the reason for the extension requested is  
5 that the Defendants' counsels require additional time to prepare a responsive pleading to the  
6 Plaintiff's Complaint in view of the Plaintiff's filing of a Motion for Temporary Restraining Order  
7 [ECF No. 3] and the pendency of the briefings thereon [ECF No. 16].  
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9 Upon agreement by and between all the parties herein, the undersigned respectfully request this  
10 Court grant an extension of time, up to and including **July 27, 2020**, for all Defendants to file their  
11 Answer or otherwise respond to Plaintiff's Complaint.

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The parties have entered into this Stipulation in good faith and not for purposes of delay.

DATED this 20<sup>th</sup> day of July, 2020  
LIPSON NEILSON P.C.

/s/ Lisa J. Zastrow

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*Attorneys for Defendants Nevada Charter  
Academies dba American Preparatory  
Academy – Las Vegas, Lee Iglody, Jonathan  
Gardner, Melissa St. Jean, Ernie Elliott,  
Candyce Farthing*

DATED this 20<sup>th</sup> day of July, 2020.

HOGAN HULET

/s/ Kenneth E. Hogan

KENNETH E. HOGAN, ESQ.  
Nevada Bar No. 10083  
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Las Vegas, NV 89144  
*Attorneys for Defendant Rachelle Hulet*

DATED this 20<sup>th</sup> day of July, 2020.  
TAKOS LAW GROUP, LTD.

/s/ Zachary P. Takos

ZACHARY P. TAKOS, ESQ.  
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*Attorneys for Plaintiff*

-and-

PARR BROWN GEE & LOVELESS

JONATHAN O. HAFEN, pro hac vice pending  
CHAD S. PEHRSON, pro hac vice pending  
STEPHEN C. MOURITSEN, pro hac vice  
pending  
101 South 200 East, Suite 700  
Salt Lake City, UT 84111

*Attorneys for Plaintiff*

### ORDER

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: July 21, 2020

**LIPSON NEILSON P.C.**

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